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FEDERAL COMMUNICATIONS COMMISSION

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20054

In the matter of)
)
Federal- State Joint Board on) CC Docket No. 96-45
Universal Service) DA 98-2410
)

COMMENTS OF ITCs, INC.
FEDERAL-STATE JOINT BOARD ON UNIVERSAL SERVICE
SECOND RECOMMENDED DECISION

ITCs, Inc., an economic cost consultant to independent telephone companies serving America's rural areas, on behalf of Chariton Valley Telephone Company, Cunningham Telephone Company, ETEX Telephone Cooperative, Moka Dial, Inc. - Kansas, Moka Dial, Inc. - Missouri, Moultrie Independent Telephone Company, Inc., Plains Telephone Cooperative Association, Inc., South Central Telecommunications of Kiowa, South Central Telephone Association - Kansas, South Central Telephone Association - Oklahoma, Tri Country Telephone Association, Inc., TCT West, Inc. and Wiggins Telephone Association, through counsel, respectfully respond to the Commission's invitation for comments on the Universal Service Joint Board's Second Recommended Decision designated DA 98-2410 released November 25, 1998.

Introduction

1. ITCs serves small rural Local Exchange Carriers (LECs) located in the mid-west and Rocky Mountain regions of the United States. In these regions the barriers of distance and density remain critical impediments to the provision of universal service. It is here that, for over 100 years, the need for economic support in the quest for universal service has been recognized and provided for in a highly successful manner. That requirement has not diminished; in fact, given the dramatic technological changes in telecommunications, the need is even greater now and will be greater in

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the future if the principles of universal service are to be realized and the promises of the "Information Super Highway" are to be extended to rural America.

2. While ITCs recognizes the orientation of the Second Recommendation as well as the current activities of the Commission are presently focused on the provision of support in high cost areas by non-rural carriers, that rural carrier support systems will not be altered until at least January 1, 2001 and that the Rural Task Force is addressing rural carrier support, ITCs feels compelled to offer comments in that usually those provisions and rules governing large carriers are eventually submitted for consideration in the provision of support for rural carriers. Accordingly, ITCs respectfully submits these comments.

The Jurisdictional Division of Responsibility

3. The "25/75" jurisdictional division of responsibility contained in the *Universal Service Order* of May 8, 1997 reflected the development of regulatory policy at its worst. Fraught with political influence, spite for the state-generated 8th Circuit Court action and a clear failure to recognize the economic principles driving the success of universal service policies, the May 8th Order would have eventually led to results exactly opposite from those intended, particularly in the American rocky mountain region.

4. The reversal of that approach in this *Second Recommended Decision* warrants commendation by the rural telecommunications community as well as their total support. The fact that a key universal service mechanism involved support from the high density, high profit and low cost regions of the nation has been in place for a century has been restored by the Joint Board, demonstrates an understanding of the process. It also demonstrates that without a national focus, just as has existed under a monopolistic environment with implicit support, certain states simply do not have the resources sufficient to meet the obligation.

5. Again, ITCs on behalf of the rural companies it represents, commends the Joint Board and renews its support for the process.

Enabling “Reasonably Comparable” Rates

6. ITCs remains of the opinion that the term “reasonably comparable” as used in The Act means that rural customer should enjoy services of the same type and quality offered customers in the more profitable, lower cost urban areas, and that where that can not be done due to the barriers of distance and density, support should be available. Stated differently, as is manifested from the 1996 Act, rural consumers should not be prejudiced against when it come to telecommunications services.

7. Realization of this statutory principle requires a limited cost and service quality variance. Further, consideration must be given to the total cost of communicating with a rural customer’s community of interest and the normal institutions of society. Where a customer is faced with a limited calling scope and must incur toll costs to reach schools, churches, medical facilities and retail services, then the cost of the toll, or alternatively, the cost of EAS services, should be included when evaluating the comparability of rates.

8. It is in this arena that the Joint Board has also taken steps that are to be commended and supported. Specifically, “...use of the *cost* of providing all supported services, rather than rates.” is recommended in determining federal high cost support. (Paragraph 19) This extremely wise in that it is the high cost that must be the focus of attention if universal service is to be achieved, not the rates paid for services. First, in a competitive environment pricing takes on a whole new meaning a meaning which is not related to cost in the same manner as existed in a regulated monopolistic environment. Second, a competitive environment requires rate setting flexibility which is not available if there is to be a USF linkage. Third, in the past, rates have been the “solution” to

political and social concerns as well as local economic considerations. If rates are to continue to be tied to USF, the resulting lack of uniformity will only serve to promote a support program that is inconsistent and inequitable while remaining off the real target identified by the Joint Board, which is cost. Accordingly, we strongly support this recommendation -- the use of cost.

Forward-Looking Economic Costs and Models

9. Although endorsing a cost-based USF system, ITCs strongly objects to the use of forward-looking costs. They are theoretical in nature. They may or may not reflect the costs of providing service; accordingly they will most likely affect the credibility of the process while providing for long term fruitless debates between everyone involved. Inasmuch as there is no correct answer when dealing with theoretical costs, the debate will be never ending. Lastly, there is no prospect of carrier accountability with forward looking, theoretical costs.

10. Even after theoretical costs are determined, one can not forget the fact that customers do not pay theoretical bills, employees do not work for theoretical wages, investors do not provide theoretical capital nor do they accept theoretical interest payments and dividends.

11. Of even greater concern is the use of models to determine theoretical costs. After enormous efforts, usable results have not been forthcoming, nor can they ever be. The provision of service in rural America is unique; each circumstance is different. Real costs must be the standard.

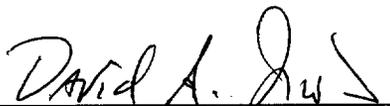
12. The Commission would do well to listen to the Commissioner Harold Furchtgott-Roth in his dissenting statement on the Joint Board Recommendation. Simply stated, "he got it right".

Summary

13. The Joint Board must be commended and supported. The Second Recommended Decision corrects many of the deficiencies contained the original Order. We strongly recommend the efforts to build a credible universal service support process continue. We also strongly recommend reconsideration of the use of forward-looking costs and related models. They will only distort and prevent the process.

Respectfully submitted

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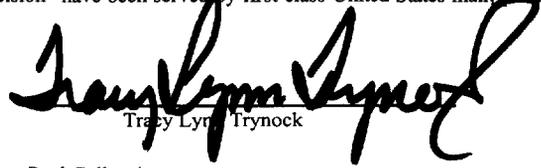
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December 23, 1998

CERTIFICATE OF SERVICE

I, Tracy L. Trynock, hereby certify that on this 23rd day of December, 1998, copies of the foregoing "Comments of ITCs, Inc. Federal-State Joint Board on Universal Service Second Recommended Decision" have been served by first-class United States mail, postage pre-paid or by hand delivery upon the following:



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